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**From:** Ross, Mary [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=98359CD1F66F46EC91D327E99A3C6909-ROSS, MARY]  
**Sent:** 8/4/2015 6:17:57 PM  
**To:** Cogliano, Vincent [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=51f2736376ac4d32bad2fe7cfef2886b-Cogliano, Vincent]  
**Subject:** FW: Ethics Check Question

FYI.

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**From:** Routt, Christiane  
**Sent:** Tuesday, August 04, 2015 1:55 PM  
**To:** Ross, Mary; Blackburn, Elizabeth  
**Subject:** RE: Ethics Check Question

It's good. Nathan is an ADEO for the IOAA, and he, Bill Ocampo (the ORD Ethics Coord) and myself discussed before sending.

Thank you for circling back, though. I appreciate it!

Christiane E. Routt  
Deputy Chief of Staff  
Office of Research and Development, US EPA  
W: 202-564-6801  
C: Personal Phone / Ex. 6

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**From:** Ross, Mary  
**Sent:** Monday, August 03, 2015 9:04 AM  
**To:** Blackburn, Elizabeth; Routt, Christiane  
**Subject:** FW: Ethics Check Question

Hi Liz and Christiane. I meant to forward this on Friday. I told Vince that we've done this in the past, having individuals write a check to pay for meals or snacks provided at the meeting and treating it as a meeting-related fee on the TA/voucher. He pointed out that the email message was from someone who's probably not an ethics official, so I'll send this to you to be sure.

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**From:** Cogliano, Vincent  
**Sent:** Thursday, July 30, 2015 4:34 PM  
**To:** Ross, Mary  
**Subject:** FW: Ethics Check Question

Hello Mary—Below you'll find a chain of messages regarding accepting meals at next week's Woods Hole meeting. As my DEO, would you please advise me what to do? ... Thanks—Vince

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**From:** Smith, Kelley  
**Sent:** Thursday, July 30, 2015 3:40 PM  
**To:** Gentry, Nathan; Ocampo, William; Routt, Christiane  
**Cc:** Olden, Kenneth; Burke, Thomas; Cogliano, Vincent; Jarabek, Annie; Kadeli, Lek; Corona, Elizabeth  
**Subject:** RE: Ethics Check Question

Nathan, Bill, and Christiane,

Thank you for reviewing the particulars and getting back to me. I have added the other attendees to my response so they are also made aware of the ethics guidance. I will circle back with the NAS staff to let them know what we will be doing.

Having been in this situation before I would recommend that all attendees write a check to NAS for the \$116.25. It is also recommended that in the note field on your check you write: \$ for NAS provided food at 9.4.2015 event. By doing this your bank will retain a digital record of this transaction and you will not have to worry about keeping receipts etc which will also make things easier on NAS.

Best,

KS

Kelley Smith  
Program Advisor  
Office of Research and Development  
Environmental Protection Agency  
202.564.2308 (Desk)  
**Personal Phone / Ex. 6** (ell)  
[Smith.Kelley@epa.gov](mailto:Smith.Kelley@epa.gov)

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**From:** Gentry, Nathan  
**Sent:** Thursday, July 30, 2015 3:32 PM  
**To:** Smith, Kelley <[Smith.Kelley@epa.gov](mailto:Smith.Kelley@epa.gov)>; Ocampo, William <[Ocampo.William@epa.gov](mailto:Ocampo.William@epa.gov)>  
**Cc:** Routt, Christiane <[Routt.Christiane@epa.gov](mailto:Routt.Christiane@epa.gov)>  
**Subject:** RE: Ethics Check Question

Kelley,

As we have discussed, the funding for the food is being provided by a private grant from the American Chemistry Council (ACC), not the NAS. The ACC is a registered lobbyist under the Lobbying Disclosure Act (LDA), 2 U.S.C. § 1601, et seq., and per Executive Order 13490, political appointees are not allowed to accept any gifts (including meals) from registered lobbyists. Because you and Dr. Burke are governed by that Order, you both are prohibited from accepting the free food.

Lek Kadeli and the other participants are not restricted by the Executive Order, however, there is still an issue of appearance if they accepted the gift. ORD interacts with the ACC on multiple research projects, and accepting this gift could cause an appearance of the loss of impartiality.

I advise each individual conference participant to write a check to the NAS to cover the cost of the meals provided at the meeting. According to the cost breakdown provided, this would come to \$116.25 per person. Please contact me if you have any questions about my response to your question.

Nathan Gentry  
Scheduler for Tom Burke, Lek Kadeli and Bob Kavlock  
EPA Office of Research and Development  
Phone: 202-564-9084  
Fax: **Personal Phone / Ex. 6**

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**From:** Smith, Kelley  
**Sent:** Wednesday, July 29, 2015 9:30 AM

**To:** Ocampo, William  
**Cc:** Routt, Christiane; Gentry, Nathan  
**Subject:** Re: Ethics Check Question

The NAS has two main meetings each year of the BEST committee which focuses on environmental and public health science. These sessions are opportunities for agencies to discuss potential research that the NAS might be asked to review. The EPA attendees are all on the schedule to speak to the members of the NAS regarding potential projects.

I would be the only one not speaking and am traveling in a support capacity for tom and Lek.

I don't have any further info regarding the grant... What info would you need to make a determination?

Thank you,

Kelley

Sent from my iPhone

On Jul 29, 2015, at 7:22 AM, Ocampo, William <[Ocampo.William@epa.gov](mailto:Ocampo.William@epa.gov)> wrote:

Hi Kelley,

Thank you for checking in with us. To answer your questions, we'll need additional details about the event: the purpose of the event, who else is invited, location, etc. Also, your e-mail mentioned the costs are to be covered by NAS via an unrestricted private grant. Please provide us with any information you may have on this grant. Thanks!

William Ocampo  
Policy and Management Integrity Division  
EPA Office of Research and Development  
Office: (202) 564-0987  
Mobile: Personal Phone / Ex. 6

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**From:** Smith, Kelley  
**Sent:** Monday, July 27, 2015 4:55 PM  
**To:** Routt, Christiane; Ocampo, William  
**Cc:** Gentry, Nathan  
**Subject:** Ethics Check Question

Hello Christiane and Bill,

Dr. Burke, Lek Kadeli, and others noted below are planning to speak at and participate in the open session meetings on August 4<sup>th</sup>. The NAS during a call today about the logistics of the event indicated that they are providing food and covering food costs. I asked them to share the total cost and to confirm who was offering to pay.

1. Is this something that we can accept?
2. If we can accept the free food is there any additional paperwork or documentation we need to follow or is the overall cost of the food under a paperwork threshold?

Best,

KS

Kelley Smith  
Program Advisor  
Office of Research and Development  
Environmental Protection Agency  
202.564.2308 (Desk)  

Personal Phone / Ex. 6 III)

[Smith.Kelley@epa.gov](mailto:Smith.Kelley@epa.gov)

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**From:** Ballweg, Claire [<mailto:CBallweg@nas.edu>]  
**Sent:** Monday, July 27, 2015 4:47 PM  
**To:** Smith, Kelley  
**Subject:** RE: Dr. Burke and Lek Kadeli: August 4-5 BEST meeting

Hi Kelley, here is the food information

EPA guests:  
Lek Kadeli  
Kenneth Olden  
Thomas Burke  
Vincent Cogliano  
Annie Jarabek  
Kelley Smith

The food that will be covered for the EPA guests will be on August 4<sup>th</sup>, 2015:

Meal	Per Person Price	Total Price
Breakfast	\$15.00	\$90.00
Morning Break	\$5.25	\$31.50
Lunch	\$29.00	\$174.00
Dinner	\$67.00	\$402.00

All of the costs will be covered by the National Academies through an unrestricted private grant.

Best, Claire

Keck W628  
(202) 334-3982  
[cballweg@nas.edu](mailto:cballweg@nas.edu)